

Ballard Spahr LLP

700 East Gate Drive, Suite 330
Mount Laurel, NJ 08054-0015
TEL 856.761.3400
FAX 856.761.1020
www.ballardspahr.com

Neal Walters
Tel: 856.761.3438
Fax: 856.761.1020
waltersn@ballardspahr.com

March 23, 2022

Hon. Matthew J. Skahill
U.S. District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

Re: *In re Subaru Battery Drain Products Liability Litigation*
Case No. 1:20-cv-03095-JHR-MJS


Dear Judge Skahill:

I am writing on behalf of the Subaru defendants in this matter to request a brief extension to the deadline for filing the motion for preliminary approval (the "MPA") of the class settlement that the parties are actively negotiating. I have spoken to class counsel and they have indicated that they do not oppose the request.


The present deadline pursuant to the Court's February 15 Order (ECF 69), is April 1. Since last communicating with the Court, the parties have made further progress toward finalizing the proposed settlement, including completing the confirmatory discovery deposition of Subaru's 30(b)(6) witness, John Gray. This is a large settlement and working closely with the class settlement administrator, JND, to ensure that the settlement agreement is consistent with the administration of the prospective extended warranty service program as well as the claims program, is time consuming. In addition, Subaru of America, Inc. is also actively engaged with Subaru's parent company in Japan to confirm the negotiation of the details in real time. For these reasons, the Subaru defendants request that the Court extend the deadline for filing the MPA until April 29, which will afford the parties an opportunity to ensure that all of these important activities are executed with consistency and effective settlement administration.

Thank you for Your Honor's consideration of this request. Please do not hesitate to contact me if the Court has any questions.

Respectfully,


Neal Walters

NW/mds

SO ORDERED this 28th day
of March 20 22

Matthew J. Skahill, USMJ